

BLANK ROME LLP
Naki Margolis, ESQ. (SBN 94120)
NMargolis@BlankRome.com
601 Montgomery Street, Suite 2030
San Francisco, CA 94111
Phone: 415.986.2144
Facsimile: 415.986.4461

BLANK ROME LLP
Victor M. Wigman, Esq.
Charles R. Wolfe, Jr. Esq.
Brian Wm. Higgins, Esq.
Nicholas M. Nyemah, Esq. (SBN 274550)
600 New Hampshire Avenue, N.W.
Washington, DC 20037
Phone: 202.772.5800

BLANK ROME LLP
David A. Dorey, Esq.
1201 Market Street, Suite 800
Wilmington, DE 19801
Phone: 302.425.6400
Fax: 302.425.6464

Attorneys for Plaintiff,
SEGAN LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEGAN LLC,

Plaintiff,

v.

ZYNGA INC.,

Defendant.

Case No. 3:14-cv-01315-VC

**STIPULATION AND ~~PROPOSED~~
ORDER TO FILE UNDER SEAL
DOCUMENTS IN SUPPORT OF SEGAN
LLC'S OPPOSITION TO ZYNGA
INC.'S MOTION FOR BOND**

Date: November 20, 2014
Time: 10:00 a.m.
Place: 4, 17th Floor
Judge: Honorable Vince Chhabria

Pursuant to L.R. 79.5, Plaintiff Segan LLC ("Segan") and Defendant Zynga, Inc. ("Zynga") hereby stipulate and respectfully move the Court to enter an Order sealing the following exhibit filed in support of Segan's Response in Opposition to Zynga's Motion for Bond, filed concurrently herewith.

- Exhibit D to the Declaration of David A. Dorey, Esq. ("Dorey Declaration").
- A quotation of language in Exhibit D of the Dorey Declaration on page 5 of Segan's Response in Opposition to Zynga's Motion for Bond.

The Stipulation is made for the following reasons:

This Exhibit was marked "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Zynga pursuant to a Stipulated protective Order entered into by the parties and approved by the Court on September 4, 2014.

Exhibit D to the Dorey Declaration contains information that Zynga has identified as confidential and proprietary business information of Zynga regarding game development and source code processes. Pursuant to the protective Order, Zynga contends that that disclosure of this information would harm it by providing competitors with otherwise unavailable information.

This application is narrowly tailored to seal only confidential information rather than information that has already been publicly disclosed.

In accordance with L.R. 79-5, Segan is filing a redacted copy of its Response in Opposition to Zynga's Motion for Bond and is filing the entire Exhibit D of the Dorey Declaration under seal. This Stipulation is accompanied by the Declaration of David A. Dorey, Esq.

WHEREFORE, Segan and Zynga respectfully request that the Court enter an Order granting the relief requested above. A proposed Order is attached.

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2 SO STIPULATED:

3 DATED: October 30, 2014

4 BLANK ROME LLP

By: /s/ David A. Dorey

5 DAVID A. DOREY

Attorney for Plaintiff

6 Segan LLC

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9 DATED: October 30, 2014

DURIE TANGRI LLP

By: /s/ Durie Tangri

10 DURIE TANGRI

Attorney for Defendant

11 Zynga, Inc.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IT IS SO ORDERED:

Segan LLC may file under seal the following documents:

- Exhibit "D" to the Declaration of David A. Dorey, Esq. attached to Segan LLC's Response in Opposition to Zynga, Inc.'s Motion for Bond.
- An un-redacted version of Segan LLC's Response in Opposition to Zynga, Inc.'s Motion for Bond, containing a quotation from Exhibit "D" to the Declaration of David A. Dorey, Esq., attached thereto.

Dated: November 7, 2014



HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT COURT JUDGE